

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

Turtle Island Foods, SPC, doing business as)	
The Tofurky Company, and)	
)	
The Good Food Institute, Inc.,)	
)	
Plaintiffs,)	
)	
v.)	No. 2:18-cv-4173-FJG
)	
Mark Richardson, in his official capacity as)	
Cole County Prosecuting Attorney and)	
on behalf of all Missouri Prosecuting Attorneys,)	
)	
Defendant.)	

JOINT STATUS REPORT

On May 2, 2019, this Court granted the parties an additional one month to file a Stipulation of Dismissal, and noted that “if additional time is needed beyond June 3, 2019, the parties will be expected to provide a more detailed discussion of what additional time is necessary and what specific steps have been taken toward finalizing the settlement.” ECF No. 53.

The parties continue to work diligently to execute a final settlement agreement. The parties attended court-ordered mediation on January 22, 2019. Following mediation, the parties began exchanging draft settlement agreements and negotiating terms and specific language. In early April, after several drafts were exchanged, Plaintiffs believed that an impasse had been reached on certain material terms. Counsel for Defendant suggested inquiring with the mediator to discuss the possible impasse and for clarification on the terms the parties agreed to at the January 2019 mediation. On May 1, 2019, a telephone conference was held with the mediator. Following the telephone conference with the mediator, the settlement drafting resumed. On May

21, 2019, counsel for Plaintiffs and counsel for Defendant spoke on the telephone about certain terms in the current draft agreement that still needed to be negotiated in order for the settlement to be finalized. Plaintiffs' counsel circulated an updated draft of the agreement on or about May 29, 2019, pursuant to the issues discussed on May 21, 2019. On June 3, 2019, Defendant's counsel indicated that they are still considering the updated draft and should have substantive feedback on or before June 7, 2019. The parties also note for the Court that, in the event a final agreement is reached, the current terms provide that there is a time period in which signatures of local prosecutors to the agreement will be gathered and the lawsuit will be dismissed only upon return of a sufficient number of signatures.

The parties respectfully request an additional 30 days to finalize the settlement agreement.

Respectfully submitted,

/s/ Gillian R. Wilcox

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Certificate of Service

I certify that on June 3, 2019, a copy of the foregoing was electronically filed with the Court using the CM/ECF system, which sent notification to counsel of record.

/s/ Gillian R. Wilcox